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March 23, 2005

Secretary
Federal Communications Commission
Washington, DC 20554

RE: Petition to remove LPTV application BNPTTL-
20000831BCR from Auction 81, Group MX180

Ladies and Gentlemen:

As explained in the attached "Engineering Statement" the subject application was amended during the August 2001 settlement window to clear the conflicts with the other applications in this group.

I believe it is not necessary for my application to be in the auction as there is neither an incoming or outgoing conflict.

Please reclassify my application as a "singleton".

Respectfully submitted

s/s Mark Silberman
Applicant

B. W. St. Clair

**ENGINEERING STATEMENT IN SUPPORT OF THE
PETITION OF MARK SILBERMAN TO BE REMOVED
FROM AUCTION 81, GROUP MX180**

Introduction

Application BNPTTL-20000831BCR has been included in MX180 in spite of the unilateral engineering changes filed in a settlement window to clear the conflicts with the other applications in this group.

Outgoing Interference:

Outgoing interference was analyzed and was determined to be of no significance.

Incoming Interference:

The application contains a statement added in the August 2001 settlement window to the effect that the applicant will accept interference from the other applicants in this group. This statement appears when this application is viewed on CDBS. A copy of the page with this statement as it appears in CDBS is attached. See paragraph #4, Conclusion.

Discussion

The applicant by unilateral changes and additions to the application during a settlement window has cleared both outgoing and incoming conflicts. Thus it should not be in an auction with the other applicants in MX180.

Respectfully submitted,



B. W. St. Clair
Engineering Consultant
March 23, 2005

Exhibit 1

Description: SECTION III, EXHIBIT 6, M284

THIS APPLICATION MODIFICATION PROVIDES AN EXHIBIT CONTAINING ADDITIONAL INTERFERENCE STUDY INFORMATION RESPONSIVE TO QUESTION 13 IN THE TECH SECTION IN ORDER TO ALLOW IT TO BE REMOVED FROM AUCTION GROUP M284, AUCTION 81 AND TREATED AS A 'SINGLETON' APPLICATION.

Attachment 1

Exhibit 6

Description: ENGINEERING EXHIBIT - INTERFERENCE ANALYSIS

ENGINEERING EXHIBIT - INTERFERENCE ANALYSIS

IN RE: APPLICATION FOR LOW POWER TELEVISION BROADCAST STATION LICENSE, AUGUST, 2000 WINDOW

AUCTION NUMBER 81, ENGINEERING SOLUTION TO SEPARATE THIS APPLICATION FROM MUTUALLY EXCLUSIVE GROUP

1. INTRODUCTION

GROUP: M284

APPLICANT:

M284 MN 54 KENNA MARK SILBERMAN BNPTTL20000831BCR

CONFLICTING APPLICATIONS HAVING ONE OR MORE OVERLAPPING PROTECTED/INTERFERING CONTOURS PER PUBLIC NOTICE DA-0129:

M284 NM 54 PORTALES TRINITY CHRISTIAN CENTER BNPTT20000831BVY

M284 NM 54 ROSWELL TRINITY BROADCASTING/ NE BNPTT20000830BEN

2. DISCUSSION

ALTHOUGH THERE ARE ONE OR MORE OVERLAPPING PROTECTED V. INTERFERING CONTOURS BETWEEN THIS APPLICATION AND OTHER APPLICATIONS AS SHOWN BELOW, ALL WERE SUBJECTED TO AN ANALYSIS OF POTENTIAL INTERFERENCE WHICH INCLUDES A LONGLEY-RICE STUDY IN ACCORDANCE WITH OET BULLETIN 69 OF THE ACTUAL PREDICTED INTERFERENCE, INCOMING AND OUTGOING, BETWEEN THIS APPLICATION AND THE IDENTIFIED CONFLICTING APPLICATIONS WITHIN THE SAME AUCTION GROUP. THE FINDINGS ARE SHOWN BELOW.

3. ANALYSIS

INTERFERENCE CAUSED BY THE APPLICANT'S PROPOSED FACILITY TO

M284 NM 54 PORTALES TRINITY CHRISTIAN CENTER BNPTT20000831BVY

...NONE.

INTERFERENCE CAUSED BY THE CLIENT APPLICANT'S PROPOSED FACILITY TO

M284 NM 54 ROSWELL TRINITY BROADCASTING/ NE BNPTT20000830BEN

...NONE.

INTERFERENCE CAUSED BY THE FOLLOWING APPLICATIONS TO THE CLIENT APPLICANT'S PROPOSED FACILITY ARE AS FOLLOWS:

M284 NM 54 PORTALES TRINITY CHRISTIAN CENTER BNPTT20000831BVY

...25 PERSONS, FOR 58.14F THE PROTECTED CONTOUR POPULATION..

M284 NM 54 ROSWELL TRINITY BROADCASTING/ NE BNPTT20000830BEN

...ZERO PERSONS.

IF APPLICABLE, THE LONGLEY-RICE STUDY PRINTOUT IS SHOWN IN ITEM #5 BELOW.

4. CONCLUSION

WHEN A LONGLEY-RICE STUDY IS USED AS PART OF THE APPLICATION, NO INTERFERENCE IS CAUSED BY THE APPLICANT'S PROPOSAL. BY THE SAME MEASUREMENT, INTERFERENCE TO ZERO PERSONS WITHIN THE APPLICANT'S 74 DBU CONTOUR PER OET BULLETIN 69 IS CAUSED FROM THE TRINITY PROPOSAL IN ROSWELL AND INTERFERENCE TO 25 PERSONS PER OET BULLETIN 69 IS CAUSED TO THE APPLICANT'S PROPOSAL FROM THE TRINITY PROPOSAL IN PORTALES . IN REGARD TO THE INTERFERENCE INCOMING TO THE APPLICANT, IT IS BELIEVED TO BE MINIMAL AND IS ACCEPTABLE TO THE APPLICANT. THUS, THIS APPLICATION IS NO LONGER MUTUALLY EXCLUSIVE WITH ANY OTHER IN ITS AUCTION GROUP. ACCORDINGLY, IT IS REQUESTED THAT IT BE REMOVED FROM THE GROUP AND ALLOWED TO PROCEED FORTHWITH TO THE PERMITTING PROCESS, WHICH SIMILARLY FREES THE TRINITY APPLICATIONS IN THE SAME GROUP.